



FEB 03 2021

**UPS Tracking #1ZE93A020190513317**

January 28, 2021

USEPA Region VIII Director  
Air & Toxics Technical Enforcement Program  
Office of Enforcement, Compliance and Environmental Justice, Mail Code 8ENF-AT  
1595 Wynkoop Street, Denver CO 80202-1129

RE: Semi-annual Reports (NSPS Subparts OOOO & OOOOa)  
Gilcrest Gas Plant (Permit#07WE0881)

Dear Sir or Madam:

Attached are Semi-annual Reports (SAR) covering the Leak Detection and Repair program (LDAR) for the Gilcrest Gas Plant, located in Weld County, Colorado. The reports cover the period from July 1, 2020 through December 31, 2020, and include LDAR programs for the following regulations:

- NSPS Subpart OOOO

Reporting for NSPS Subpart OOOOa has been completed through the EPA's Compliance and Emissions Data Reporting (CEDRI) system pursuant to 40 CFR §60.5422a(b).

To meet the requirements of 40CFR§60.4(a), 40CFR§60.487(a) and Colorado Regulation Number 6, these reports have been submitted in duplicate to the Colorado Department of Public Health & Environment.

Please let me know if you need further information or have additional questions. I may be reached by email at [gstahnke@akaenergy.com](mailto:gstahnke@akaenergy.com), or by phone at (720) 946-0244.

Sincerely,

Graham Stahnke  
Sr. Environmental Compliance Specialist  
Aka Energy Group, LLC

Attachments

cc: Colorado Department of Public Health & Environment, APCD-SS-B1, 4300 Cherry Creek Drive South, Denver, CO 80246  
(Submitted via email: [cdphe.nspsoooo@state.co.us](mailto:cdphe.nspsoooo@state.co.us))

# Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

**Plant: AKA ENERGY - GILCREST**

**Unit: CO2 Membrane Process**

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	133	0	0	0	0	0
OCTOBER	133	0	0	0	0	0
NOVEMBER	133	0	0	0	0	0
DECEMBER	133	0	0	0	0	0
JULY	133	0	0	0	0	0
AUGUST	133	0	0	0	0	0
<b>PUMP</b>						
AUGUST	0	0	0	0	0	0
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
<b>RELIEF</b>						
AUGUST	1	0	0	0	0	0
SEPTEMBER	1	0	0	0	0	0
OCTOBER	1	0	0	0	0	0
NOVEMBER	1	0	0	0	0	0
DECEMBER	1	0	0	0	0	0
JULY	1	0	0	0	0	0
<b>VALVE</b>						
AUGUST	47	0	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	47	0	0	0	0	0
OCTOBER	47	0	0	0	0	0
NOVEMBER	47	0	0	0	0	0
DECEMBER	47	0	0	0	0	0
JULY	47	0	0	0	0	0
		0	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: Compression Process

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	2155	0	0	0	0	0
OCTOBER	2155	0	0	0	0	0
NOVEMBER	2155	0	0	0	0	0
DECEMBER	2155	0	0	0	0	0
JULY	2155	0	0	0	0	0
AUGUST	2155	0	0	0	0	0
<b>PUMP</b>						
AUGUST	4	0	0	0	0	0
SEPTEMBER	4	0	0	0	0	0
OCTOBER	4	0	0	0	0	0
NOVEMBER	4	0	0	0	0	0
DECEMBER	4	0	0	0	0	0
JULY	4	0	0	0	0	0
<b>RELIEF</b>						
SEPTEMBER	18	0	0	0	0	0
OCTOBER	18	0	0	0	0	0
NOVEMBER	18	0	0	0	0	0
DECEMBER	18	0	0	0	0	0
JULY	18	0	0	0	0	0
AUGUST	18	0	0	0	0	0
<b>VALVE</b>						
AUGUST	321	0	0	0	0	0



## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	321	0	0	0	0	0
OCTOBER	321	0	0	0	0	0
NOVEMBER	321	0	0	0	0	0
DECEMBER	321	0	0	0	0	0
JULY	321	1	0	0	0	0
		1	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-OOOO

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: Cryogenic Process

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	933	0	0	0	0	0
OCTOBER	933	0	0	0	0	0
NOVEMBER	933	0	0	0	0	0
DECEMBER	933	0	0	0	0	0
JULY	933	0	0	0	0	0
AUGUST	933	0	0	0	0	0
<b>PUMP</b>						
AUGUST	4	0	0	0	0	0
SEPTEMBER	4	0	0	0	0	0
OCTOBER	4	0	0	0	0	0
NOVEMBER	4	0	0	0	0	0
DECEMBER	4	0	0	0	0	0
JULY	4	0	0	0	0	0
<b>RELIEF</b>						
SEPTEMBER	4	0	0	0	0	0
OCTOBER	4	0	0	0	0	0
NOVEMBER	4	0	0	0	0	0
DECEMBER	4	0	0	0	0	0
JULY	4	0	0	0	0	0
AUGUST	4	0	0	0	0	0
<b>VALVE</b>						
AUGUST	282	0	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	282	0	0	0	0	0
OCTOBER	282	0	0	0	0	0
NOVEMBER	282	1	0	0	0	0
DECEMBER	282	0	0	0	0	0
JULY	282	0	0	0	0	0
		1	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: Inlet Gas Process

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	1359	0	0	0	0	0
OCTOBER	1359	0	0	0	0	0
NOVEMBER	1359	0	0	0	0	0
DECEMBER	1359	0	0	0	0	0
JULY	1359	1	0	0	169	0
AUGUST	1359	0	0	0	0	0
<b>PUMP</b>						
AUGUST	1	0	0	0	0	0
SEPTEMBER	1	0	0	0	0	0
OCTOBER	1	0	0	0	0	0
NOVEMBER	1	0	0	0	0	0
DECEMBER	1	0	0	0	0	0
JULY	1	0	0	0	0	0
<b>RELIEF</b>						
SEPTEMBER	17	0	0	0	0	0
OCTOBER	17	0	0	0	0	0
NOVEMBER	17	0	0	0	0	0
DECEMBER	17	0	0	0	0	0
JULY	17	0	0	0	0	0
AUGUST	17	0	0	0	0	0
<b>VALVE</b>						
AUGUST	561	0	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	561	0	0	0	0	0
OCTOBER	561	0	0	0	0	0
NOVEMBER	561	2	0	0	0	0
DECEMBER	561	0	0	0	0	0
JULY	561	0	0	0	0	0
		3	0	0	169	0



## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: NGL Y Grade Storage and Handling Process

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	1195	0	0	0	0	0
OCTOBER	1195	0	0	0	0	0
NOVEMBER	1195	0	0	0	0	0
DECEMBER	1195	0	0	0	0	0
JULY	1195	0	0	0	0	0
AUGUST	1195	0	0	0	0	0
<b>PUMP</b>						
AUGUST	8	1	0	0	0	0
SEPTEMBER	8	0	0	0	0	0
OCTOBER	8	0	0	0	0	0
NOVEMBER	8	0	0	0	0	0
DECEMBER	8	0	0	0	0	0
JULY	8	0	0	0	0	0
<b>RELIEF</b>						
AUGUST	13	0	0	0	0	0
SEPTEMBER	13	0	0	0	0	0
OCTOBER	13	0	0	0	0	0
NOVEMBER	13	0	0	0	0	0
DECEMBER	13	0	0	0	0	0
JULY	13	0	0	0	0	0
<b>VALVE</b>						
AUGUST	337	1	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	337	0	0	0	0	0
OCTOBER	337	0	0	0	0	0
NOVEMBER	337	0	0	0	0	7
DECEMBER	330	0	0	0	0	0
JULY	337	0	0	0	0	0
		2	0	0	0	7

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: Refrigeration Process

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	2560	0	0	0	0	0
OCTOBER	2590	0	0	0	30	0
NOVEMBER	2590	0	0	0	0	0
DECEMBER	2590	0	0	0	0	0
JULY	2560	1	0	0	0	0
AUGUST	2560	0	0	0	0	0
<b>PUMP</b>						
AUGUST	8	0	0	0	0	0
SEPTEMBER	8	0	0	0	0	0
OCTOBER	8	0	0	0	0	0
NOVEMBER	8	0	0	0	0	0
DECEMBER	8	0	0	0	0	0
JULY	8	0	0	0	0	0
<b>RELIEF</b>						
SEPTEMBER	29	0	0	0	0	0
OCTOBER	29	0	0	0	0	0
NOVEMBER	29	0	0	0	0	0
DECEMBER	29	0	0	0	0	0
JULY	29	0	0	0	0	0
AUGUST	29	0	0	0	0	0
<b>VALVE</b>						
AUGUST	758	0	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	758	0	0	0	0	0
OCTOBER	765	0	0	0	7	0
NOVEMBER	765	2	0	0	0	3
DECEMBER	762	0	0	0	0	0
JULY	758	1	0	0	0	0
		4	0	0	37	3

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: Sulfatreat Process

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	489	0	0	0	0	0
OCTOBER	489	0	0	0	0	0
NOVEMBER	489	0	0	0	0	0
DECEMBER	489	0	0	0	0	0
JULY	489	0	0	0	0	0
AUGUST	489	0	0	0	0	0
<b>PUMP</b>						
AUGUST	0	0	0	0	0	0
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
<b>RELIEF</b>						
SEPTEMBER	8	0	0	0	0	3
OCTOBER	5	0	0	0	0	0
NOVEMBER	5	0	0	0	0	0
DECEMBER	5	0	0	0	0	0
JULY	8	0	0	0	0	0
AUGUST	8	0	0	0	0	0
<b>VALVE</b>						
AUGUST	193	0	0	0	0	0



## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	193	0	0	0	0	0
OCTOBER	193	0	0	0	0	0
NOVEMBER	193	2	0	0	0	0
DECEMBER	193	0	0	0	0	0
JULY	193	0	0	0	0	0
		2	0	0	0	3

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

## Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

Plant: AKA ENERGY - GILCREST

Unit: Truck Loading Process Area

Month	Active Count	M21 Leaks	Late Repairs	Delayed	Added	Deleted
<b>COMPR</b>						
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
AUGUST	0	0	0	0	0	0
<b>CONECT</b>						
SEPTEMBER	368	0	0	0	0	0
OCTOBER	368	0	0	0	0	0
NOVEMBER	368	0	0	0	0	0
DECEMBER	368	0	0	0	0	0
JULY	368	0	0	0	0	0
AUGUST	368	0	0	0	0	0
<b>PUMP</b>						
AUGUST	0	0	0	0	0	0
SEPTEMBER	0	0	0	0	0	0
OCTOBER	0	0	0	0	0	0
NOVEMBER	0	0	0	0	0	0
DECEMBER	0	0	0	0	0	0
JULY	0	0	0	0	0	0
<b>RELIEF</b>						
SEPTEMBER	6	0	0	0	0	0
OCTOBER	6	0	0	0	0	0
NOVEMBER	6	0	0	0	0	0
DECEMBER	6	0	0	0	0	0
JULY	6	0	0	0	0	0
AUGUST	6	0	0	0	0	0
<b>VALVE</b>						
AUGUST	58	0	0	0	0	0

## Semi-Annual for NSPS (RNSPS)

Report Date: 1/27/2021

### Report Parameters

Regulation: EPA60-0000

Unit: All Process Units

Connectors Included

Pressure Relief Devices Included



Reporting Period: 7/1/2020 - 12/31/2020

SEPTEMBER	58	0	0	0	0	0
OCTOBER	58	0	0	0	0	0
NOVEMBER	58	0	0	0	0	0
DECEMBER	58	0	0	0	0	0
JULY	58	0	0	0	0	0
		0	0	0	0	0

## NSPS Subpart OOOO - Process Unit Shutdown Summary

DATE	DURATION ( Time )	DESCRIPTION	OOOO ( Affected Unit )
July	1.5 hrs	7/31/2020 - Plant down for 1.5 hours to change inlet filter screens.	All
August		No shutdowns	
September	3.5 days	9/21-9/24/2020 - Full plant turnaround, repaired all DOR tags with the exception of 2979.01 and 2922.01 as NGL storage could not be drained while plant was down. Tags 2979.01 and 2922.01 were repaired on 9/28/20 and 10/2/20 respectively.	All
October		No shutdowns	
November		No shutdowns	
December		No shutdowns	

NSPS Subpart OOOO - INVENTORY REVISIONS

REPORTABLE INVENTORY COMPONENTS	PREVIOUS PERIOD ENDING ( 6/30/2020 )	CURRENT PERIOD ENDING ( 12/31/2020 )
<b><u>Process Unit: CO<sub>2</sub> Membrane Process</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	47	47
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	0	0
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	133	133
Pressure Relief Devices 60.5422a	0	1
<b><u>Process Unit: Compression</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	365	321
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	4	4
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	2486	2155
Pressure Relief Devices 60.5422a	0	18
<b><u>Process Unit: Cryogenic Process</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	276	282
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	0	4
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	933	933
Pressure Relief Devices 60.5422a	0	4
<b><u>Process Unit: Inlet Gas Process</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	568	561
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	1	1
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	1238	1359
Pressure Relief Devices 60.5422a	0	17



NSPS Subpart OOOO - INVENTORY REVISIONS

<b><u>Process Unit: NGL Y Grade Storage &amp; Handling</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	341	330
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	8	8
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	1196	1195
Pressure Relief Devices 60.5422a	0	13
<b><u>Process Unit: Refrigeration Process</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	756	762
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	8	8
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	2560	2590
Pressure Relief Devices 60.5422a	0	29
<b><u>Process Unit: Sulfatreat Process</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	193	193
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	0	0
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	489	489
Pressure Relief Devices 60.5422a	0	5
<b><u>Process Unit: Truck Loading Process Area</u></b>		
Valves (excluding No Detectable Emissions) 60.482-7a & 60.482-7a(f)	58	58
Pumps (excluding No Detectable Emissions) 60.482-2a, 60.482-2a(e), & 60.482-2a(f)	0	0
Compressors (excluding No Detectable Emissions) 60.482-3a, 60.482-3a(i), & 60.482-3a(h)	0	0
Connectors 60.482-11a	368	368
Pressure Relief Devices 60.5422a	0	6